

# CONSULTATION AND COORDINATION





## SUMMARY OF PUBLIC INVOLVEMENT

Consultation and coordination among the government agencies, organizations, and the public were an important part of the planning process for the *Final General Management Plan / Environmental Impact Statement* for Crater Lake National Park. The public had two primary avenues by which it participated during the development of the plan: participation in public meetings and response to newsletters.

### PUBLIC MEETINGS AND NEWSLETTERS

Public meetings and newsletters were used to keep the public informed and involved in the planning process for Crater Lake National Park. A mailing list was compiled that consisted of members of government agencies, nongovernmental groups, businesses, legislators, local governments, and interested citizens.

The notice of intent to prepare an environmental impact statement was published in the *Federal Register* on May 25, 2001. A newsletter issued January 2001 described the planning effort. Public meetings were held during April 2001 in Klamath Falls, Medford, Roseburg, and Salem and were attended by 96 people. A total of 72 written comments were received in response to that newsletter. A second newsletter issued in July 2001 summarized the comments received in the meetings and in response to newsletter 1. These comments were used to complete the park purpose and significance statements that serve as the foundation for the rest of the planning. Comments on various issues facing the park were referred to during development of the general management plan.

A third newsletter distributed in the spring of 2002 described the draft alternative concepts and management zoning for managing the park. A total of 95 comments were received in response to that newsletter. In general opinions were fairly divided in support of individual alternatives and how to address the issues. A number of letters favored continued snowmobile use while other people favored elimination of snowmobiles in the park. Opinions were divided on managing traffic on Rim Drive — maintaining current two-way traffic, converting part of the road to one-way traffic, or closure of the road to traffic. Most respondents favored use of shuttles. A number of people who opposed partnering with private industry were concerned with large-scale commercialization within the park.

### CONSULTATION WITH THE STATE HISTORIC PRESERVATION OFFICE AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION

Agencies that have direct or indirect jurisdiction over historic properties are required by section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470, et seq.) to take into account the effect of any undertaking on properties eligible for the National Register of Historic Places. To meet the requirements of 36 CFR 800, the National Park Service sent letters to the Oregon Historic Preservation Office and the Advisory Council on Historic Preservation on November 17, 2000, inviting their participation in the planning process. Both offices were sent all the newsletters with a request for comments.

## **CONSULTATION WITH NATIVE AMERICANS**

Letters were sent in November 2000 to the Cow Creek Band of the Umpqua Indian Tribe and the Klamath Tribes to invite their participation in the planning process. The tribes were informed on the scope of the planning project and the preliminary alternatives by newsletter. The first official government- to- government consultation with the Klamath Tribes in relation to park projects took place in November 2001 and can be credited largely to a meeting with members of the tribal council in August. Both meetings set some parameters for consulting with tribal staff while a cooperative agreement on conducting on-going consultation was being negotiated. The tribes were sent the draft plan for review and comment.

## **CONSULTATION WITH THE U.S. FISH AND WILDLIFE SERVICE**

A list of federally threatened, endangered, and proposed species that may be present, or in the vicinity of Crater Lake National Park dated June 28, 2002, was received from the U.S. Fish and Wildlife Service (USFWS) and is included in appendix B. A meeting between the Park Service and the USFWS Klamath Falls Field Office to discuss consultation responsibilities for the general management plan and other park projects was held in May 2003. Additional discussions with the USFWS concerning effects on federally listed species also occurred as part of the preparation of the draft plan and environmental impact statement.

The National Park Service has determined the preferred alternative may affect, but would not be likely to adversely, the Lost River sucker, shortnose sucker, or Canada lynx and may have some adverse effect on

the following federally threatened species: bald eagle, northern spotted owl, and bull trout. The National Park Service will initiate formal consultation with the USFWS regarding the effects on bald eagle, northern spotted owl, Canada lynx, and bull trout. The USFWS was sent a copy of the public draft of this plan for their review and to serve as a biological assessment for consultation. Comments and results of the consultation from USFWS are included in the final environmental impact statement.

## **AGENCIES AND ORGANIZATIONS TO WHOM THIS DOCUMENT WAS SENT**

### **Federal Agencies**

Advisory Council on Historic Preservation  
Forest Service

Winema National Forest  
Rogue River National Forest  
Umpqua National Forest  
USFS Toketee Ranger Station  
Chiloquin Ranger District

Department of the Interior  
Fish and Wildlife Service  
National Park Service  
Office of Public Affairs  
Oregon Caves National Monument  
Water Rights Branch  
EPA, Region 10

### **American Indian Tribes**

The Klamath Tribe  
Klamath Tribe Attorney  
Klamath Tribe Planning Department  
Cow Creek Band of the Umpqua Tribe

### **U.S. Senators and Representatives**

Senator Ron Wyden  
Senator Gorden Smith  
Congressman David Wu, 1st District  
Congressman Greg Walden, 2nd District

Congressman Earl Blumenauer, 3rd  
District  
Congressman Peter DeFazio, 4th District  
Congressman Darlene Hooley, 5th  
District

### **State Government**

Oregon Department of Fish and Wildlife  
Oregon Department of Transportation  
Oregon Historical Preservation Office  
Oregon Natural Resources Council  
Jason Atkinson, Oregon Senate  
Lenn Hannon, Oregon Senate  
Steve Harper, Oregon House of  
Representatives  
Tim Knopp, Oregon House of  
Representatives  
Oregon State Parks

### **Local Governments**

City of Chiloquin  
City of Klamath Falls  
Planning Director  
City of Medford  
Planning Director  
City of Roseburg  
Deschutes County Library  
Douglas County Library  
Eugene Library  
Jackson County Commissioners  
Jackson County Planning Director  
Josephine County Library  
Klamath County Commissioners  
Klamath County Planning Director  
Klamath County Library  
Klamath County Museum  
Multnomah County Library  
Prospect Schools  
Roseburg Area Chamber of Commerce  
Salem Library

### **Organizations / Businesses**

Alla Mage Ski Club  
Audubon Magazine

Backcountry Horsemen  
Bay Area Economics  
Blue Ribbon Coalition  
Broken Arrowhead Ranch  
CC Riders Snowmobile Club  
Century West  
Chiloquin Ridge Riders  
Coalition of Equestrians Club  
College of Oceanography  
Crater Lake Lodge, Inc.  
Dain Bosworth, Inc.  
David Evans and Associates  
Delaware North Companies  
Denali National Park Concessions Office  
Diamond Lake Homeowners  
District Ranger, Klamath Ranger District  
Ecology of Environment, Inc.  
Edelweiss Ski Club  
Estramade Ranch  
Fletcher Farr Ayotte  
Friends of Crater Lake National Park  
GM, Paradise Inn, National Park Inn  
Goold's Sprague River Ranch, Inc.  
Grants Pass Nordic Ski Club  
Grants Pass Resource Area  
Institute for Policy Research,  
Northwestern U.  
J & E Ranch  
Jack Owens Ranches  
KAGO  
KDRV, Channel 12  
Klamath Basin Snowdrifters  
Klamath Bow Hunters  
Klamath Co Economic Development Assn.  
Klamath County Economic Development.  
Association  
Klamath Motor Sports  
Knipe and Knipe, Inc.  
KOIN - TV  
KOMO TV  
KOTI TV  
KPIC, Channel 4  
KS Wild  
KTVL, Channel 10  
Lake Quinault Lodge  
Landau Associates, Inc.  
League of Women Voters

## CONSULTATION AND COORDINATION

LMJ Cattle Company  
Mail Tribune  
Medford District Office  
Medford Mail Tribune  
Medford Visitors Convention Bureau  
Meyer and Glitzenstein  
Mt. Hood Snowmobile Club  
Murase Associates  
National Parks Conservation Association  
Nature Conservancy  
News Review  
Nordic Club  
Northwester Tours  
Oregon Historical Society  
Oregon Hunter's Association  
Oregon Nordic Club  
Oregon Parks Foundation, Inc.  
Oregon Snowmobile Association  
Oregon State University, College of Forestry

Oregon Tourism Commission  
OSSA  
Ottaway News Service  
Robert Peccia & Associates  
Rogue Snowmobile Club  
Rogue Snowmobiling  
S.W. Jeffries and Company  
Sierra Club  
Siskiyou Audubon Society  
Siskiyou Reg. Ed. Proj.  
Umpqua Watersheds, Inc.

### Individuals

There are more than 250 individuals to whom copies of this EIS were sent. A complete listing of these names is available from the Superintendent, Crater Lake National Park, Hwy. 62, Crater Lake, OR 97604.

## RESPONSES TO COMMENTS ON THE DRAFT PLAN

The National Park Service received 646 comments on the *Draft Crater Lake National Park General Management Plan / Environmental Impact Statement*. Three comments were received from agencies, one comment was received from an American Indian Tribe, and 47 comments were received from individuals. Three form letters comprised the remaining 599 comments.

The Council on Environmental Quality (1978) guidelines for implementing the National Environmental Policy Act require the National Park Service to respond to “substantive” comments. A comment is substantive if it meets any of the following criteria from Director’s Order 12, “Conservation Planning and Environmental Impact Analysis” (NPS 1999).

- It questions, with reasonable basis, the accuracy of information.
- It questions, with reasonable basis, the adequacy of environmental analysis.
- It presented reasonable alternatives other than those proposed in the plan.
- It would cause changes or revisions in the preferred alternative.

The comments received from the Klamath Tribes expressed support for alternatives 1, 2, and 4. The comment expressed requested assurance that snowmobile use is not negatively impacting natural resources.

Twenty- nine of the individual comments expressed preference for one of the four alternatives. Three individuals preferred alternative 1, 11 preferred alternative 2,

five preferred alternative 3, and ten preferred alternative 4.

The primary focus of comments was on the use of snowmobiles in the park., which is discussed below. Road closure, shuttles, and snowcoaches also received a number of comments. Road closure received an almost equal level of support (6) and opposition (9). Those commenting on shuttles (7) generally supported adding a shuttle to Rim Drive. Those commenting on snowcoaches (4) also expressed support. Other issues raised included stock use, the Mazama laundry and other facilities, partnerships, RVs, and support to retain the quiet tranquility of the park.

### Responses to Comments Concerning Snowmobiles

The issue that received the majority of comments was snowmobiling. Letters from 24 individuals or organizations commented on snowmobile use in the park. Six letters, including one from the Oregon State Snowmobile Association, supported retaining existing snowmobile access. Bluewater Network, Umpqua Watersheds, and The Wilderness Society along with 15 individuals supported eliminating snowmobiling from the park. Three form letters, each with a number of respondents, were received.

Two of the form letters supported snowmobile use. One of those with 11 copies supported alternative 3 due to Alternative 2’s restriction of snowmobile use to current levels. The second form letter, which had 28 copies, supported alternative 2 and requested a loop route be added for snowmobiles. In addition, this letter did not support the use of snowcoaches and felt there was no advantage to seasonal closure of East Rim Drive.

The third form letter had the largest number of copies, 560. This letter supported alternative 4. The letter supported a ban on snowmobiles, closure of Rim Road, use of mass transit and shuttle buses, a ban on gas- powered motorboats, and the adoption of cleaner, greener fuels.

NPS management policies and regulations provide general direction for the use of snowmobiles in areas of the national park system. Executive Order 11644, “Use of Off- Road Vehicles on Public Lands” as amended by EO 11989) provides general direction for the use of snowmobiles and ORVs. Under NPS implementing regulations (36 CFR 2.18 and 36 CFR 4.10) the use of snowmobiles and ORVs within areas of the national park system is prohibited, except on water surfaces and designated routes that are used by motorboats and motor vehicles during other seasons. The snowmobile regulation further states that “snowmobiles are prohibited except where designated and only when their use is consistent with the park’s natural, cultural, scenic, and aesthetic values, safety considerations, park management objectives, and will not disturb wildlife or damage park resources.” Likewise, 2001 *National Park Service Management Policies* (8.2.3.1) states that routes and areas may be designated for ORV use only when it would be consistent with the purposes for which the park unit was established and only in locations where there will be “no adverse impacts on the area’s natural, cultural, scenic and esthetic values, and in consideration of other visitor uses.” In addition to the above guidance, 2001 *National Park Service Management Policies* (8.2.2.1) state that any restriction of appropriate recreational uses will be limited to what is necessary to protect park resources and values, to promote visitor

safety and enjoyment, or to meet park management needs. It also states the superintendent will develop and take management actions, as appropriate, to ensure that recreational uses and activities with the park are consistent with authorizing legislation and do not cause unacceptable impacts to park resources or values.

Current snowmobile use in Crater Lake National Park is permitted along the North Entrance Road. Access to the rim of the caldera for viewing Crater Lake is consistent with the park’s purpose, significance, and mission during summer and winter seasons. Crater Lake National Park seeks to provide a variety of visitor experiences while still protecting the visitor, employees, and the environment.

Comments supporting the elimination of snowmobile use in the park brought up questions regarding impacts to wildlife, water quality, noise, air quality, and soil. At present, studies have not been conducted nor data obtained demonstrating the relationships between operation of snowmobiles and natural resource conditions in the park. NPS has made a substantial effort to study snowmobile and other winter use at Yellowstone and Grand Teton parks. One study considered new snowmobile technology and the possibility that the use of those technologies could reduce the impacts caused by snowmobiles. However, it has not been determined whether those lessons are applicable elsewhere. The effects of winter recreational activities in Crater Lake National Park are unknown, although, adverse impacts are anticipated to be limited because visitor use levels are expected to remain relatively low and would continue to occur within limited areas within the park. The Park Service would initiate a long- term data gathering



and monitoring program to evaluate winter use and associated impacts. In addition the Park Service would develop a methodology to evaluate changes and establish limits to changes in resource conditions and visitor use and experience. Changes in resource conditions and visitor use and experience would be addressed through a variety of potential management actions. Development of the data gathering and monitoring plan would follow the GMP.

#### **LETTERS TO FOLLOW**

Of the many letters received, some have ideas that were outside the scope of this

*General Management Plan / Environmental Impact Statement*. The National Park Service values this input, and where applicable it will be taken into account in future plans. However no response is provided to such comments in the document.

Photocopies of the letters from agencies, the tribe, those having “substantive” comments as defined previously, and a sample of letters representing opinions on the use of snowmobiles are included in the following section. Responses to the “substantive” comments are provided.



## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

Klamath Falls Fish and Wildlife Office  
6610 Washburn Way  
Klamath Falls, OR 97603  
(541) 885-8481 FAX (541) 885-7837



In Reply Refer To:  
1-10-04- F-003

SEP 24 2004

SEP 22 2004

#### Memorandum

To: Resource Specialist, Denver Service Center,  
Denver, Colorado

From: Field Supervisor, Klamath Falls Fish and Wildlife Office,  
Klamath Falls, Oregon *Curt Mullis*

Subject: Formal Consultation for the Adoption of Alternative Two of the Draft General  
Management Plan/EIS for Crater Lake National Park, Klamath County, Oregon

This memorandum transmits the U.S. Fish and Wildlife Service's (Service) Biological Opinion (BO) and concurrence on the effects to listed species from the adoption of alternative two of the Draft Management Plan (GMP for Crater Lake National Park (Park) located in Crater Lake, Oregon. Your request for these documents was dated July 30, 2004, and received by us on August 4, 2004. Our review is performed in accordance with section 7 of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et. seq.) (Act).

Crater Lake National Park (Park) has made the following effects determinations for listed species:

northern spotted owl ( <i>Strix occidentalis caurina</i> )	May affect, Likely to Adversely Affect
bull trout ( <i>Salvelinus confluentus</i> )	May affect, Likely to Adversely Affect
bald eagle ( <i>Haliaeetus leucocephalus</i> )	May affect, Likely to Adversely Affect
Canada Lynx ( <i>Lynx canadensis</i> )	May affect, Not Likely to Adversely Affect
Lost River sucker ( <i>Deltistes luxatus</i> )	No Effect
shortnose sucker ( <i>Chasmistes brevirostris</i> )	No Effect
Applegate's milkvetch ( <i>Astragalus applegatei</i> )	No Effect

Those species for which the Park has found No Effect from the proposed action will not be addressed further in this document.

The Park did not request a conference on potential impacts to the proposed critical habitat for bull trout within the Park. When the proposed critical habitat is formally designated, the Park may need to re-initiate consultation if the adoption of this GMP is determined to may affect designated critical habitat.



Elaine Rideout, Natural Resource Specialist

1-10-04-F-003

If you have any questions regarding this BO please contact Doug Laye of my staff at (541) 885-8481.

Attachment:

Biological Opinion and Concurrence Regarding the Effects from the Adoption of Alternative 2 of the Draft General Management Plan/Environmental Impact Statement for Crater Lake National Park

cc:

Chuck Lundy, NPS, Crater Lake, Oregon  
Mac Brock, NPS, Crater Lake, Oregon  
Terri Urbanowski, NPS, Denver, Colorado  
Craig Tuss, FWS, Roseburg, Oregon

September 28, 2004

Reply To  
Attn Of: ETPA-088

Ms. Terri Urbanowski01-038-NPS  
National Park Service  
P.O. Box 25287  
Denver, Colorado 80225-0287

Dear Ms. Urbanowski:

The U.S. Environmental Protection Agency (EPA) has reviewed the Crater Lake General Management Plan Draft Environmental Impact Statement (DEIS) [ERP # NPS-L61227-OR; CEQ # 040348] in accordance with our responsibilities under the National Environmental Policy Act and under Section 309 of the Clean Air Act. The General Management Plan, which establishes a management philosophy and framework for decision making in the park, is intended to provide guidance during a 15 to 20 year period.

The General Management Plan DEIS preferred alternative is Alternative 2, which is also identified as the environmentally preferred alternative. The emphasis of Alternative 2 is on increased opportunities for non-motorized and low impact recreational diversity, and on research and education. New opportunities along Rim Drive would allow visitors to directly experience Crater Lake in ways other than driving.

We wish to commend the National Park Service for the environmentally sensitive range of alternatives and for selection of the environmentally preferred alternative. The proposed General Management Plan reflects stewardship of park resources and encourages a stronger human connection with the natural environment. We hope and anticipate that this will serve to foster continued stewardship for future generations. Based on our review, we are rating the DEIS as LO, Lack of Objections. An explanation of this rating is enclosed.

Thank you for the opportunity to comment. If you have any questions, please contact Elaine Somers of my staff at 206/553-2966.

Sincerely,

/s/

Christine B. Reichgott, Manager

NEPA Review Unit

Enclosure



# Oregon

Theodore R. Kulongoski, Governor

## Parks and Recreation Department

Heritage Conservation Division

725 Summer St. NE, Suite C

Salem, OR 97301-1271

(503) 986-0707

FAX (503) 986-0793

[www.hcd.state.or.us](http://www.hcd.state.or.us)

August 24, 2004

Mr. Charles Lundy  
NPS Crater Lake  
PO Box 7  
Crater Lake, OR 97604

RE: SHPO Case No. 04-1890

Draft Environmental Impact Statement/General Management Plan For Crater Lake NP  
Crater Lake National Park, Klamath/Jackson/Douglas Counties

Dear Mr. Lundy:

We have reviewed the submitted Draft General Management Plan, and find the preferred alternative to be the most appropriate for the continuing protection, preservation and adaptive rehabilitation of cultural resources at Crater Lake National Park. We concur with a determination of No Historic Properties Adversely Affected for all of the documented alternatives.

Our response here is to assist you with your responsibilities under Section 106 of the National Historic Preservation Act (per 36 CFR Part 800) and NEPA. Please feel free to contact me if you have further questions, comments or need additional assistance.

Sincerely,

Sarah Jalving  
Historic Compliance Specialist  
(503) 986-0679 or [Sarah.Jalving@state.or.us](mailto:Sarah.Jalving@state.or.us)





October 1, 2004

The Klamath Tribes' Natural Resource Department would like to take this opportunity to provide comments on the Crater Lake National Park Draft Management Plan. Thank you for the opportunity to comment.

The primary issues of concern for the Natural Resource Department with regards to Crater Lake National Park are aquatic and wildlife resources that originate within the Park and eventually make their way to the former Klamath Reservation. In addition, wildlife that migrate seasonally between the Park and the former Klamath Reservation are of concern.

With that in mind, the Natural Resource Department supports Alternatives 1, 2, or 4. Alternative 3, we believe, places too much emphasis on visitor services and not enough on protection and enhancement of natural resources. However, if Alternatives 1 or 2 are selected, we recommend that a thorough review of snowmobile compatibility be conducted to assure that snowmobile use is not negatively impacting natural resources. Wildlife is particularly susceptible to displacement and disturbance during the critical winter months.

Thank you for providing the opportunity to comment. Please feel free to contact the Natural Resource Department if you have any questions or comments. Thank you.

Sincerely,

Rick Ward  
Wildlife Biologist

501 Chiloquin Blvd. - P.O. Box 436 - Chiloquin, Oregon 97624  
(541) 783-2219 - Fax (541) 783-2609



Page 1

1316 Peartree Lane  
Medford, OR 97504

August 20, 2004

Terri Urbanowski  
National Park Service  
Denver Service Center  
P.O. Box 25287  
Denver, CO 80226

I have read the Draft General Management Plan/Environmental Impact Statement, May 2004, for Crater Lake National Park.

I find all of the alternatives except Alternative 1 (No Action) to be unacceptable, because Alternatives 2, 3, and 4 contain elements that are counter to the spirit of the NPS Organic Act of 1916, or cater to small special interest groups to the disadvantage of the majority, or propose actions not justified by the information in the Report itself. Also, the Alternatives (except for Number 1) display a general flavor of "wish-lists," but these wishes are going to run headlong into a major problem of our times -- conflicts over budgetary priorities. The enormous backlog of unmet maintenance in the parks is scarcely mentioned in the Report, yet I believe this to be the principal problem confronting the National Park Service today. Many of the Park Service press releases have acknowledged this problem, but the Draft Report pretends like it doesn't exist.

I wish to emphasize the fact that Crater Lake National Park is an unusually well-managed park as it stands. I do understand that planners feel that they must create change, and that "no action" represents failure. But here, the changes proposed in Alternatives 2, 3, and 4 would create damage to a beautifully functioning system, and should be rejected.

Who would be damaged by these changes? The general public, of course, which overwhelmingly uses automobiles to visit the park. This fundamental truth is contained in the report itself, as noted below:

Page 96: ". . . Crater Lake National Park is principally a day use area. Eighty-one percent of visitors to the park spend less than a day."

Page 97: ". . . the most common visitor activities are scenic driving (94%), viewing Crater Lake (71%), and photography (63%)."

The Draft Plan, in all of the alternatives except Number 1, gives the impression that the planners disapprove of the manner in which the overwhelming number of visitors enjoy the park, and would like to change that. These changes are proposed in the name of a vague concept called "diversity."

The word "diversity" is a powerful one these days, carrying with it as it does the implication of racial discrimination. Yet there is no hint of racial discrimination in the Draft Report, nor should there be. When examined carefully, the word, if it has any real meaning at all in this context, seems to mean that bicycles will be favored, or that visitors will be pressed to engage in activities which will keep them longer inside the

park. The latter notion is described on Page 153, for Alternative Number 2, under “Diversity of Recreational Opportunity:

“... there would be a focused range of visitor experiences emphasizing research, learning, and more in-depth experience of park resources. Visitors would have opportunities to participate in guided field trips, seminars, and workshops. This focused learning environment would enable park interpreters and partnering researchers to convey a broader range of information and involve park visitors in hands-on learning experiences about both natural and cultural park resources.”

I have no particular objection to the provision of such learning experiences. What I do object to is the implication that the present mode of use, as described earlier, is deemed to be unacceptable by the writers of the Draft Report, regardless of what the visitors themselves might think.

I think the visitors should have the right to decide for themselves the manner in which they wish to enjoy the park, and there is at least one aspect of Alternative 2 that would interfere with that right, and it is the suggestion that an “experimental” seasonal closure of the Rim Drive is contemplated.

(Page 153) “Greater *diversity* [italics mine] of visitor use along Rim Drive would be provided by seasonal closure of East Rim Drive during the autumn shoulder season, allowing visitors an opportunity to experience the primary resource of the park in ways other than driving, as new (nonmotorized) uses would be encouraged in areas that have space to accommodate them.”

(Page 154) “Because there would be an addition in recreational opportunities (seasonal non-motorized use along Rim Drive) and an expansion of existing educational/interpretive programs (in-depth, focused educational field trips and seminars), the change in the *diversity* of visitor experience would be highly noticeable, exceptionally beneficial, and would affect relatively large numbers of visitors, resulting in a major beneficial impact on the *diversity* of visitor opportunity.” [Italics mine.]

The quotes above are remarkable, especially the second one. It is the only place in the Draft Report that I can remember that the words “exceptionally beneficial,” and “would affect relatively large numbers of visitors” appear.

There is absolutely no evidence provided in the Draft Report that a seasonal closure of the Rim Drive would be “exceptionally beneficial” or would positively affect “relatively large numbers of visitors.” The latter phrase is certainly true in a certain sense, because a “relatively large number of visitors” would be adversely affected, and these are among the 94% of visitors who consider the park’s prime value to be scenic driving. As for those who would find a closure, seasonal or otherwise, to be “exceptionally beneficial,” the only ones I can identify are bicyclists or perhaps a few hikers, who would certainly relish having a section of the Rim Drive to themselves. (Since I am a hiker myself, I ought to appreciate such an opportunity, but, unless the Rim Drive were to be obliterated in exchange for a trail, I can not see hiking along a paved road as very attractive.)

With regard to the other aspect which the Draft Report seems to find “exceptionally beneficial,” namely, the offering of “in-depth, focused educational field trips and seminars”, I have no quarrel with the concept, but frankly doubt that many of the visitors, who treat the park as primarily a day use area, will take advantage of them.



Wording has been changed.

I am driven to two conclusions: (a) closure, seasonal or otherwise, of parts of the Rim Drive would benefit a very small number of people, and disadvantage a very large number; (2) the offering of in-depth, focused educational field trips is praiseworthy, but I doubt that many visitors will take advantage of them. Thus, I find the wording "exceptionally beneficial" quoted above from pages 153 and 154 to be ludicrous in the extreme, flying in the face of the facts, and apparently representing only the views of the writers of those words.

I would note here that I have been a fan of National Parks since the age of 10, and even served for three summers as a ranger at Sequoia National Park, from 1946-1948. My wife and I have visited 323 of the 390+ National Park units, some of them many times. We adore the parks, and our observation is that the Park Service does a generally good job of administering the parks, in spite of all the special interest (read: pressure) groups that try to get their own desires implemented.

My experience with Crater Lake goes back more than 60 years, and I have visited it so many times that I have lost count. Just this year, I have been there 5 times, mostly in the middle of the peak summer season. The only place I have experienced any congestion is at Rim Village, and even there I could always find a place to park, even on a Sunday afternoon.

I note, fortunately, that congestion is only occasionally mentioned in the Draft Management Report. In fact, the Draft Management Report acknowledges the fact that visitation has reached something of a plateau, and in fact was less in a recent year (2000), than in previous years. The Report even states (Page 95) that visitation is expected to increase only slightly in future years. Nevertheless, on Page 137, the Report uses the language, "... as crowding along Rim Drive *escalates* ..." [italics mine]. The use of such a dramatic word, as opposed to the earlier words "only slightly," demonstrates to me that the planners are determined to adopt the mindset that congestion is a major factor to be dealt with, regardless of the facts.

I submit to you that congestion doesn't exist to any meaningful degree in the park, except at a few places such as Rim Village and at the parking lot for Cleetwood Cove. Why, then, does every alternative except the "No Action" alternative envision actions such as shuttle busses and closure of parts of the Rim Road, which are the usual kinds of measures used to combat congestion? Admittedly, in Alternative 2, the closure is described as "experimental," but conducting such an experiment implies that there is a need, and I state categorically: There is no need.

I would remind you that the Rim Road at one time was indeed changed into a one-way road, and it was extremely unpopular. Fortunately, the park canceled the one-way nonsense, and returned to a two-way road. But now the proposal for one-way is back again. Worse, Alternative 4 calls for complete closure of half the road.

The closure between Cleetwood Cove and Kerr Notch would mean that one of the prime scenic features of the park -- Cloudcap -- would no longer be available to those who depend on automobiles. Cloudcap is unique in Oregon. It is the highest point in the state reachable by a paved road. The views from Cloudcap -- of the lake, the Klamath Basin, the Klamath Marsh -- are sublime, and so is the whole subalpine feel of that spot. Cloudcap should be recognized as one of the prime scenic features of the park. Even the proposal that a section be made one-way means that one would have to travel the entire Rim Drive to get to Cloudcap, surely not an efficient use of gasoline.

It needs to be re-emphasized that only small groups of people would benefit from such closures. In all my visits to the park, I've seen only 3 bicycles on the rim road. The reply might be that more bicyclists would

Wording has been changed.

use the rim road if it were converted to one-way or to a hiking-biking trail, but my own reply is that the number would still be small, and in order to cater to the interests of this small group, a very large number of people -- those who visit the park in cars -- would be disadvantaged.

I am aware that a large number of cyclists recently engaged in a road-race around the Rim Drive, but my response to that is: Why should a National Park allow its roads to be used for a sporting event?

I would favor Alternative 2, if just one part was eliminated. This is the part which starts by saying, "Additional opportunities may be provided by seasonal closures of sections of east Rim Drive to allow hiking and biking along Rim Drive." If all reference to closures or one-way sections or Rim Drive were eliminated, I would favor Alternative 2.

I strongly favor the provision of short trails that encourage people to experience the natural environment of the park. Outstanding among the existing trails are the Castle Crest Wildflower Garden, and the Godfrey Glen Nature Trail. These two places are highly appreciated by many people, and are well-used. The paved trail along the rim from the Lodge to the base of Garfield Peak is also appreciated by many. If there are other suitable locations of equal caliber to these, I would favor the creation of additional trails. The only such place that comes to mind is Cloudcap, where a short trail through the subalpine forest might be established, which would tell the fascinating story of the relationship between Whitebark Pines and Clark's Nutcrackers.

There is one other thing, although less urgent, which disturbs me about the Draft Management Plan, and that is the emphasis I see therein upon research. I have no objections to research per se, especially given the fact that I spent my professional life on a university campus. But the emphasis in the Draft Management Plan makes me worry that research, as a separately identified management objective, might assume such a stature that it would compete for scarce budgetary resources so strongly that the primary purpose of the park would lose out, which is to provide for public enjoyment. This is one of my reasons for stating, at the outset, that all of the Alternatives except for Number 1 violate the spirit of the Organic Act of 1916.

I am well aware of the tension that exists between "preservation" and "use," stemming from the words in the Organic Act. In general, I think the Park Service has handled this tension reasonably well, although there sometimes has been an imbalance on the side of preservation. Certainly, in the eyes of some groups, such as the Sierra Club and the National Parks Conservation Association, preservation is the dominant purpose. It is because of that view, which is improper in my opinion, that I terminated my association with both of those organizations.

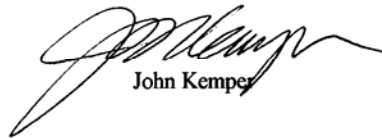
The Organic Act states, at the very beginning, in very clear language, that the fundamental purpose of all parks is "to provide for the enjoyment of the same . . .", and then adds ". . . by such means as will leave them unimpaired for the enjoyment of future generations." This is a wonderful statement, and makes clear that preservation has a specific purpose, which is to provide for future enjoyment. Thus, enjoyment is the primary purpose, and preservation is only a means to provide for that enjoyment.

As for shuttle busses, I really have no position. I just consider them to be irrelevant. They are not needed, but they also would not create any damage, except of course they would cost money. It's been something of a puzzlement to me that the Park Service pleads lack of money for the maintenance work that has been backlogged, but somehow seems to discover it has money for unneeded shuttle busses.

With regard to locating some administrative functions outside the park, I question whether there is enough benefit to justify the greater communication and coordination problems that would result. Having some of your people at a distance also has the undesirable effect of causing more travel on the roads, because face-to-face meetings at times are essential. You might produce greater traffic, gasoline use, and time-loss by such off-site location, and for what? This one needs to be examined carefully. Now if you had said that many Park personnel would rather be located in a community like Prospect, because of better access to schools, then I would have understood that. But you didn't.

To summarize: Crater Lake National Park is one of the best-run, best-managed parks known to me. Let's keep it that way. Please don't mess it up.

I am enclosing a copy of a book I recently wrote about the wonders of Southern Oregon, in which Crater Lake is described (Chapter 20) as "Southern Oregon's Crown Jewel."



John Kemper

Copies:

Superintendent Charles Lundy  
Senator Ron Wyden  
Senator Gordon Smith  
Representative David Wu  
Representative Greg Walden  
Representative Earl Blumenauer  
Representative Peter DeFazio  
Representative Darlene Hooley

Terri Urbanowski, DSC- P  
National Park Service  
P.O. Box 25287  
Denver, CO 80225- 0287

September 26, 2004

Dear Terri Urbanowski,

RE: Comments – Draft General Management Plan Environmental Impact Statement May 2004

I am Frank Purdy and I am submitting comments for High Desert Trail Riders Back Country Horsemen (HDTRBCHO) as Chairman of Public Lands and Legislation Committee. Moreover, these comments have been endorsed by Ilene Isbold, President Back Country Horsemen of Oregon.

Our concern is that the Draft General Management Plan Environmental Impact Statement MAY 2004 does not clearly recognize that stock use is a historical and legitimate use of the wilderness under the Wilderness Act of 1964. Consequently, the Draft does not respect stock use. Although, in Section PURPOSE OF AND NEED FOR THE PLAN, in sub- section Wilderness, the Draft states, “The Park Service seeks to retain wilderness potential in areas proposed as wilderness until enacted or rejected.”, and “ The administration of the wilderness meets the standards within the Wilderness Act.”, the draft states a commitment to the standards of the Wilderness Act. However, we think that the following examples taken from the draft do not demonstrate a clear commitment by the planners to stock use in the back country:

1. On page 21 in the section Planning Issues, there is the question, “Is the park currently providing an appropriate range of visitor experiences.” The paragraph then mentions the question of increasing or decreasing bicycle, hiking, camping and pedestrian access but there is no mention of stock use.
2. On page 23 in section IMPACTS TOPICS – RESOURCES AND VALUES AT STAKE IN THE PLANNING PROCESS, sub- section Wilderness Resources and Values, page 29, there is no mention of stock use as a historical and legitimate use of the park even though its is mentioned that, “Relatively few visitors use the backcountry in the park...”
3. On page 35 in Table 1: Management Zones, in Section BACKCOUNTRY, sub- section APPROPRIATE ACTIVITIES OR FACILITIES again there is no mention of stock use or facilities.
4. On page 43, in section ALTERNATIVE 2: PREFERRED ALTERNATIVE- EMPHASIS ON INCREASED OPPORTUNITIES, sub- section CONCEPT AND RELATED ACTIONS, the Draft states, “Management of the park would emphasize increased opportunities for visitors in both recreational diversity and learning about park resources.” In this sub- section is the first mention in the Draft of stock use in reference to closure of

Wording has been changed.

Wording has been changed.

Grayback Road to motorized traffic. However, the section clearly does not perceive stock use as an opportunity to increase visitors to the Park.

5. On page 97 in Section DIVERSTIY OF RECREATIONAL OPPORTUNITES it is obvious that the Park Service made no attempt to survey those who use the back country of the Park including hikers and stock users.

6. On page 98 in Section VISITOR ACCESS AND CIRCULATION is the second and final mention of stock use in the park. It is in reference to the Pacific Crest Trail, a Congressional mandated trail for hikers and stock users, and Bald Crater Loop as, "... the only two trails in park that allows stock use." The use of the negative phrase, "that allows" demonstrates the plan's inability to perceive stock use as a legitimate use of the park and its back country.

7. On page 153 the plan does not include stock use in the statement under Section - Impacts of Implementing Alternative 2- Preferred Alternative, "Existing recreational opportunities would remain, including scenic driving, front country and back country hiking, picnicking, and nature viewing.

In conclusion, a plan of over two hundred pages which plans for a diversity of use for a national park of 182,304 acres which only mentions stock use twice and never in the diversity of users, in our opinion, is not giving stock use its legitimate role in the recreational use of the park.

However, I would like to change the tone of this letter from the negative to the positive. A primary purpose of the Back Country Horsemen of Oregon and the High Desert Trail Riders Back Country Horsemen is to preserve the wilderness experience for future generations of stock users. We are most interested in meeting with the National Park Service planners to present our suggestions on how stock use can achieve its historical and legitimate role in the back country of the park. We would also like to meet with Superintendent Charles Lundy as soon as possible to present our specific recommendations on:

1. Changing the plan's language to recognize the legitimate recreational role of stock use,
2. Connecting park trails such as Sun Creek with State of Oregon Lands and Anderson Bluffs with Cascade/Pothole Spring,
3. Finding another Pack Stock Camp in addition to the Bybee Creek Stock Camp which is the only stock camp in the park,
4. Opening the trails on the eastside of the park such as Cascade Spring and Pothole Spring,
5. Reopening Lighting Creek Trail, Stuart Falls Trail, the trail to the Bybee Creek Stock Camp and the Crater Springs Trail to the trailhead,
6. Implementing adequate facilities for stock use of Grayback Road, and



Wording has been changed.

Wording has been changed.

CONSULTATION AND COORDINATION

7. Finding stock uses of the areas closed to motor traffic in the winter.

We are looking forward to your response to these comments.

Sincerely,

Frank W. Purdy, Jr.  
Chairman Public Lands and Legislation Committee HDTRBCH

copies

Charles Lundy, Superintendent Crater Lake National Park  
Ilene Isbold, President BCHO  
Stella Fenstermacher, President HDTRBCHO  
Don Howard, Chairman Public Lands and Legislation BCHO

To whom it concerns:

Please consider these comments in your Final EIS for the Crater Lake General Management Plan.

Choose Alternative 4 to eliminate snowmobile use and to use snow coaches up to the Rim Village. Otherwise, Alternative 2 is a good alternative.

The FEIS must consider all the impacts of snowmobiles on wildlife, including noise, if the ROD will allow snowmobile use to continue. The DEIS had a very poor, almost non-existent description and analysis of snowmobile impacts. For instance, the EIS should quantify how much unburned fuel (an estimation of how many gallons) is dumped into the snowpack by over 3,500 snowmobiles each winter. The FEIS should also disclose all the known health risks to people from snowmobiles.

Thank you

Thea Dykes  
896 Raven Lane  
Roseburg, OR 97470

September 2, 2003

Superintendent Charles Lundy  
Crater Lake National Park  
P.O. Box 7  
Crater Lake, OR 97604

## **RE: Comments on Crater Lake's draft General Management Plan**

Dear Superintendent Lundy:

**T**he idea of the National Park is powerful and touches upon universal themes, hopes and beliefs such as wilderness, unity and tranquility. More than 200 nations have copied our model. Some say that the National Park idea is one of the greatest gifts America has given to world culture; Bluewater Network agrees.

On behalf of Bluewater Network and the thousands of concerned citizens we represent, I respectfully submit the following comments on the National Park Service's (NPS) draft general management plan (GMP) for Crater Lake National Park.

To begin we appreciate all the hard work the NPS has put into preparing the draft GMP. We are encouraged by the NPS' willingness to address the many critical issues that will confront the park over the next couple of decades.

### ***National Park Service Mission Organic Act***

“To conserve the scenery and the natural and historic objects and the wildlife therein, and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (Organic Act 16 USC sec 1).

In 1916 Congress passed the Organic Act (16 USC sec. 1). This act contains the precedent setting idea that the United States would protect its national significant unique and irreplaceable resources in a National Park System. Furthermore, the act makes clear that one of the NPS highest priorities is to provide recreation opportunities; however that recreation is to be limited to those activities which leave the resources and values contained in the park system unimpaired for future generations. The mission statement contained in the Organic Act is not an easy task to accomplish. However, just because the NPS mission is difficult does not mean it is impossible.

### **Support for Alternative Four**

As stated above, the National Park Service's primary mission is to leave the resources and wildlife under its care unimpaired for the enjoyment of future generations. As the courts have made plainly

clear, all other considerations are secondary to this goal. Therefore, we believe alternative 4 with a few modifications best achieves the NPS mission and should be adopted by the agency.

Specifically, we support alternative 4 and its ban on snowmobiles, the seasonal closure of parts of the rim drive, the closure and reclamation of the Grayback road, and the use of mass transit shuttle buses and snowcoaches to access key park sites.

However, we have some concerns with alternative 4 and would ask that the following be addressed before it is adopted.

### ***Proactive Leadership***

#### **Partnerships**

In the draft GMP, the NPS states that one of its goals is to promote and foster partnerships with organizations connected to the park. While Bluewater Network encourages the NPS to reach out to all affected parties, we are deeply concerned about the establishment of formal partnerships. All too often, partnership agreements lead to misunderstandings at best and, at worst, an attempt by these outside interests to circumvent or prevent necessary management actions. Formal partnership agreements lead special interests groups to develop expectations that their desires will be fully accommodated. When they are not, the partnered group can paint the NPS as “non-cooperative” or lead the press and public to believe that the so-called partnership was a token political arrangement. The NPS’ troubles with so-called “cooperating agencies” in establishing winter rules for Yellowstone are a prime example of how problems can arise with partnership agreements.

Bluewater Network is also concerned with the disturbing trend by federal agencies to relinquish more control over resource management decisions to so-called partner local citizen advisory committees. While Bluewater Network certainly supports full citizen involvement in National Park management, the creation of an advisory committee and the potential recommendations of such do not release the NPS from its statutory and administrative mandates to protect and preserve park resources and wildlife. Judicial reviews of “local control” committees at units such as Niobrara National Scenic River have rendered similar opinions.

At a minimum, before the NPS enters into “partnership” with outside interests, we recommend that the final GMP include strong guidelines and policies regarding any partnership agreements. First, except where required by federal law, the NPS should make clear to any potential “partner” that the NPS alone has final say on all management decisions regarding park resources and wildlife. The agency should make expressly clear that “partnership” agreements do not release the agency from its legal mandates (in particular the Organic Act requirement) to leave park resources unimpaired. Next, the NPS should make clear that any partnership agreement will confer no right of control or decision making power over the management of park resources and wildlife, nor any control or decision making power over the development of park structures or facilities. The Park Service should also spell out that partnership agreements confer no right to advertise inside park boundaries. Finally, all partnership agreements should be made available for public review.

### ***Ban gasoline powered engines***

We were surprised to learn that the NPS allows gasoline powered engines upon Crater Lake. Even with so-called advanced technologies, gasoline powered marine engines can emit significant amounts of air and water pollution. For more on these impacts, please see the 2001 California Air Resources Board study entitled Outboard Engine and Personal Watercraft Emissions to Air and Water: A Laboratory Study.

We urge the NPS to ban gasoline powered engines from the lake and replace them with electric motors. This simple step will eliminate all air and water pollution from the lake's tour boats.

### ***Guiding Management Principles*** **Protection and Management of Natural Resources**

- *Inventory and Monitoring*

Executive Order 11644 and 11989 require the NPS to monitor the impacts of off-road vehicles (ORV) such as snowmobiles and sport utility vehicles on the resources under its jurisdiction and to close areas to ORV use if it is determined that ORV are causing impairments to park resources. ORV have been shown to cause lasting damage to air and water quality, visitor enjoyment, public health and safety, natural quiet, soil and soil stabilizers, native vegetation and wildlife. For more on these impacts please see the enclosed report "Off the Track." At a minimum, we ask the NPS to amend the GMP to include more detail on a formal program to monitor ORV impacts upon the park resources listed above.

- *Commercial Services*

Across the park system, there appears to be an alarming trend toward the privatization of services that, historically, have been provided by the NPS. Unfortunately, experience has shown that these privatization efforts do not always result in appropriate and/or high quality services that the public expects and requires. A permit to conduct jetski interpretive tours at Lake Mead National Recreation Area is a prime example of an inappropriate commercial service. We strongly encourage the NPS to privatize only those services related to automotive/gas, mass-transit, food, lodging, guide/outfitters (i.e. Mountaineering Guides) and sanitation. Since we believe the public expects the NPS to provide interpretive, visitor protection and resource management services, we strongly oppose any privatization of these programs.

- *Public Shuttle and Snowcoach Systems*

Over the years, increasing public visitation to national parks has resulted in rising automobile traffic. The expanded traffic has resulted in road congestion, motor vehicle accidents and a stretching of parking and other automobile infrastructure to the breaking point. These problems have led some public officials such as Senator Larry Craig to support limits on the number of people who can visit the parks. We believe this approach is a totally backward and unnecessary, and it unfairly punishes the park-visiting public. Rather than place limits on citizens' rights to visit their parks we suggest that limits be placed upon the number of automobiles and other machines allowed into the park. Placing limits on machines will better reduce these problems while ensuring that a maximum number of people are able to visit the parks. Only after the NPS has instituted strict limits upon motorized vehicles should it consider limiting park visitation.

Given this growing congestion we encourage the NPS at Crater Lake to follow the lead set by other parks such as Denali and Yosemite and phase out the individual use of motorized vehicles in favor of a cleaner and quieter mass transit system. We suggest following the example set by Yosemite and Grand Canyon and establishing mass transit systems for those areas that receive the most visitor traffic and contain the most fragile resources.

Short of this, we support the NPS' plan for partial closure of the rim drive to automobiles as well as the elimination of the Grayback road. These two steps will result in cleaner air and water, quieter landscapes, less congestion, and a deeper appreciation by park visitors for the park's resources.

In addition, we support the use of snowcoaches as the only winter access method. Snowcoaches will insure that park visitation continues at historic levels while reducing the amount of air and water pollution from snowmobiles, automobiles, and trucks.

- **Cleaner and Greener Fleets**

Executive Order 13148 and 13149 require federal agencies such as the NPS to provide leadership in environmental management through management actions such as using the most energy efficient vehicles available. Therefore, the NPS at Crater Lake should adopt a policy to replace its motor vehicle and motorized equipment fleets (including 4x4s, snowmobiles, motorcycles, boats, automobiles, trucks, lawn and garden equipment, etc) upon retirement, only with the most fuel-efficient and lowest-polluting equipment available. Fuel-efficient technologies are highly correlated with lower emission levels, causing less smog and even less global warming gases. Increased fuel-efficiency will also reduce the NPS gasoline budget, saving money for other important uses. We see no reason why the NPS shouldn't move to cleaner and greener fleets, setting an important example for the public and encouraging manufacturers to offer further improvements. Moreover, this move helps the NPS better achieve its mission by helping to ensure that park resources, such as air and water quality are left unimpaired while increasing agency credibility with the public.

- **Snowmachine Use of the Park**

On January 21, 1999 Bluewater Network and more than 60 additional environmental organizations petitioned the NPS to prohibit recreational snowmobile operation throughout the entire park system, including Crater Lake. (A list of the additional signatories is provided in appendix 1.) Numerous studies have shown that snowmobiles cause significant damage to air and water quality, visitor enjoyment, public health and safety, natural quiet and wildlife. (For more on these impacts please see the enclosed snowmobile petition and report.) Bluewater Network is deeply discouraged to read that that NPS is ignoring these impacts in its preferred alternative which calls for the continued snowmobile use. Several years ago the NPS at Yellowstone reached a similar conclusion. Unfortunately, today snowmobile numbers at Yellowstone have reached 60,000 annually and cause lasting damage to air and water quality, visitor enjoyment, public health and safety, natural soundscapes, and wildlife. Before this happens at Crater Lake, we strongly encourage the NPS to promulgate regulations banning snowmobiles for the entirety of the Crater Lake National Park.

- ***Appropriate Recreation***

Bluewater Network also suggests that the NPS make it a goal to provide park visitors opportunities to enjoy appropriate forms of recreation within Crater Lake National Park. To do this, we suggest that the NPS adopt the following definition of appropriate recreation for Crater Lake National Park:

Appropriate forms of recreation for Crater Lake National Park are ones that allow park visitors to become intimate with park resources and values but do not cause the derogation or destruction, directly or indirectly of those resources and values. Furthermore, appropriate recreation should provide a visitor the opportunity for inspiration and peaceful enjoyment that leads to a deepening of the visitor's understanding of the natural and cultural resources contained in the park. In addition, appropriate recreation should foster within the visitor a greater appreciation for Crater

Lake's resources and values while stimulating further awareness of the need to preserve those resources and values.

We also urge the NPS to survey all recreational activities currently taking place at Crater Lake. At the completion of this survey, the NPS should conduct environment analyses of those forms of recreation that are believed to pose a potential threat to park resources and values. If the analysis determines that the activity is causing resource impairment, mitigation measures must be implemented immediately. We also suggest that the NPS place a prohibition on new activities until such time as the agency has determined that they will not cause impairment of park resources and values.

### *Conclusion*

The draft version of Crater Lake's General Management Plan is a step in the right direction. Bluewater Network applauds the NPS for all the time and energy that went into the drafting of this document. Specifically, we support Alternative four and its call for the elimination of snowmobiles, the seasonal closure of parts of the rim drive, the closure and reclamation of the Grayback road, and the use of mass transit shuttle buses and snowcoaches to access key park sites. However, before the NPS finalizes its GMP we believe more attention should be given to: 1) potential partnerships, 2) inventory and monitoring, 3) commercial services, 4) shuttle systems, 4) cleaner and greener fleets, 5) motor vehicle problems and 8) appropriate recreation.

In conclusion, park management decisions should always ensure that the resources and values of the park system are left unimpaired for future generations. If the NPS makes this simple suggestion the cornerstone of all management decisions, the agency will have achieved its Organic Act mandate.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean Smith", with a long horizontal flourish extending to the right.

Sean Smith, MS  
Public Lands Director



## **Appendix 1**

Additional Organizations signing onto Bluewater Network's call for a complete ban on recreational snowmobile operation in the National Park System.

Alaska Public Campaigns, Soren Wuerth, Organizer  
American Canoe Association, David Jenkins, Legislative Director  
American Land Conservancy, Harriett Burgess  
American Lands, Jim Jantz  
Animal Welfare Institute, Ben White  
Aspen Wilderness Workshop, Sloan Shoemaker  
Association Working Against Keweenaw Exploitation (AWAKE), Vern Simula  
Audubon Council of Texas, Carole Wilmoth, VP  
Biodiversity Legal Foundation, Jasper Carlton, Executive Director  
Bluewater Network, Russell Long, Ph.D., Executive Director  
California Native Plant Society, Jake Sigg, President  
Campaign to Safeguard America's Waters, Gershon Cohen, Project Director  
Colorado Environmental Coalition, Pete Kolberschlag  
Colorado Wild, Inc., Lisa Philips  
Earth Island Institute, Sean Smith  
Environmental Defense Center, Marc Chytilo  
Environmental Media Services, Tom Lalley  
Florida Biodiversity Project, Brian Scherf  
Friends of the Earth, Erich Pica  
Global Service Corps, Rick Lathrop, Executive Director  
Greenpeace Foundation, Sue White, President  
GREEN, Roger Featherstone  
Hells Canyon Preservation Council, Brenda Schweitzer, Dev. Director  
High Sierra Hikers Association, Peter Browning, Coordinator  
Judy Boyce, Houston Audubon Society  
Hudson River Sloop Clearwater, Andre Mele, Environmental Director  
Humane Society for Columbia, South Carolina, Henry Brzinsky  
International Marine Mammal Protection Project, Mark Berman  
Kentucky Citizens Accountability Project, J.W. Roberts, Exec. Dir.  
Keweenaw Bioregion Chapter of the Alliance for Democracy, Vern Simula  
Klamath Siskiyou Wildlands Center, Spencer Lennard  
Lake Superior Greens, Jan Conley, Coordinator  
Massachusetts Audubon Society, Scott Hecker  
Minnesotans for Responsible Recreation, Jeff Brown, Director  
Mono County Mining Committee, Bill McNeill, Spokesperson  
Natural Resources Defense Council, Johanna H. Wald, Director, Land Program  
New Jersey Audubon  
New Jersey Conservation Foundation  
New Jersey Environmental Lobby, Marie A. Curtis, Executive Director  
Noise Pollution Clearinghouse, Les Blomberg  
Planning and Conservation League, Gerald Meral, Executive Director  
Public Media Center, Herbert Chao Gunther, President  
Ocean Advocates, Sally Ann Lentz, Executive Director  
Quiet Use Coalition, Kenneth Scott  
Restore the North Woods, Rachel Groen

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Safer Waters in Massachusetts (SWIM), Polly Bradley, Director  
Salmon Protection and Watershed Network (SPAWN), Peter Fugazzotto, Director  
Shubert and Associates, D.J. Shubert  
South Carolina Association for Marine Mammal Protection, Jim Burton  
Sky Island Alliance, Dod Mondt  
Southwest Center for Biological Diversity  
Southwest Montana Wildlands, Jim Kuipers  
South Yuba River Citizens League, Shaun Garvey  
Tides Foundation, Drummond Pike, Executive Director  
Turtle Island Restoration Network, Todd Steiner, President  
Wildland CPR, Bethany Jacob  
Wildlife Alive, Mark Palmer, Executive Director  
Wild Utah Forest Campaign, Susan Ash  
Wilderness Society, Bill Reffalt, Director National Parks and Alaska  
Wild Wilderness, Scott Silver

September 30, 2004

Terri Urbanowski, DSC-P  
National Park Service  
P.O. Box 25287  
Denver, CO 80225-0287

**RE: Comments on DEIS for Crater Lake National Park GMP**

Dear Superintendent Charles Lundy,

Thank you for the opportunity to review the Draft General Management Plan Environmental Impact Statement of May 2004. Please consider the following comments in the Final EIS.

We see merits in both the (Preferred) Alternative 2 that places emphasis on increased opportunities and Alternative 4 that emphasizes preservation and restoration of natural resources. We support a decision choosing alternative 2 with at least two major changes: one concerning continued snowmobile use in the northern part of the park, and the other on continued plowing of the road to the rim in the winter.

In general, we are pleased with the Park's general management plan, as well as the past management of the park. We appreciate that the preferred alternative will increase staff and resources in the park for research and public enjoyment. However, how likely is it that you will get the additional funds appropriated from congress? If your funding will, instead, be cut, the FEIS should list priorities of what projects will be dropped and which will stay.

**1. Snowmobiles:**

Our scoping comments encouraged you to reconsider continued snowmobile use in the park. We were disappointed to see so little discussion of the actual impacts of snowmobiles to park resources. There was a mention of two stroke engines polluting water and air quality, but there was virtually no analysis of snowmobile noise impacts on wildlife.

NEPA requires that snowmobile use within the park be fully analyzed in the General Management Plan EIS: "NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA."<sup>5</sup> You must include the impact of snowmobile noise on wildlife in the FEIS.

**Wilderness Impacts:**

The 9 miles of designated snowmobile route cuts right through the middle of the largest block of other roadless wilderness in the park. For noise impacts, it couldn't be in a more invasive place. The Parks administration of these wilderness areas must meet the standards within the Wilderness Act: "Protection of these areas in an unimpaired state for future use and enjoyment as wilderness".<sup>6</sup> The FEIS must consider if allowing the noise from snowmobiles to permeate far into the wilderness areas meets the wilderness protection requirements. It is the Park's policy to "take no action that would

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<sup>5</sup> 40 CFR 1500.1(b)

<sup>6</sup> DEIS page 14. NPS *Management Policies*; Wilderness Act of 1964; Director's Order #41

diminish the wilderness suitability of an area possessing wilderness characteristics... management decisions pertaining to lands qualifying as wilderness will be made in expectation of eventual wilderness designation.”<sup>7</sup> Therefore, the GMP FEIS decision must consider the impacts of snowmobile noise on the wilderness characteristics in the northern part of the park. The Park cannot consider the impacts in the final decision unless the impacts are disclosed in the EIS.

The DEIS says: “The alternatives place all lands within the 1974 wilderness proposal within the backcountry zone and would allow only uses and development compatible with the protection of wilderness characteristics and values.”<sup>8</sup> By not considering snowmobile noise impacts on wilderness characteristics and values, you have not fulfilled this promise. The FEIS must correct this mistake.

The area where snowmobile noise penetrates into is designated the “Backcountry” zone in the DEIS. The DEIS claims that all alternatives will manage this area for “Wilderness character and values... and resource protection”. “Tolerance for resource degradation in this zone would be very low”<sup>9</sup>. Allowing snowmobile noise to continue to penetrate the Backcountry in some alternatives does not meet these goals. The FEIS should make this clear for those alternatives.

Noise produced by snowmobiles, according to the Environmental Protection Agency, acts as a physiological stressor producing changes similar to those brought about by exposure to extreme heat, cold, or pain.<sup>10</sup> During winter, when energy expenditure is extremely important to an animal's survival, an additional stressor such as noise can throw off an animal's energy balance. Excessive noise is a serious threat to predator-prey relationships, mating, reproduction, raising young, and staking out territories.<sup>11</sup>

#### **Noise:**

In the National Parks, "natural quiet" is a protected resource defined as the "sounds produced by the natural and cultural components of the park."<sup>12</sup> National Park Service policy mandates that the Park Service "strive to preserve the natural quiet and the natural sounds associated with the physical and biological resources of the parks."<sup>13</sup> The Park Service must monitor, prevent or minimize unnatural sounds that adversely affect park resources or a Park's "scenic and aesthetic values," or which disturb Park users. To achieve these standards, "the operation of motorized equipment or sound devices that create unreasonable audio disturbances will be prohibited." Snowmobile noise research conducted at the Pictured Rocks National Lakeshore revealed the unique and disruptive sound characteristics of these machines.<sup>14</sup> At Voyageurs National Park, noise from a single snowmobile could be detected from a distance of 400-600 feet depending on the terrain (flat or rolling), and from five snowmobiles noise could be detected at 800-1000 feet.<sup>15</sup>

In Crater Lake National Park, important wilderness areas are heavily impacted by snowmobile noise. 1,000 feet on either side of the north entrance road is almost over a third of a mile wide strip, from the rim to the north park boundary. The FEIS should calculate how many acres of the wilderness are being compromised by the continued use of snowmobiles. And that would only count the legal snowmobile

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<sup>7</sup> DEIS page 17.

<sup>8</sup> DEIS Page 29.

<sup>9</sup> DEIS Page 35.

<sup>10</sup> Environmental Protection Agency. "Effects of Noise on Wildlife and Other Animals." Prepared by Memphis State University under Contract 68-04-0024, December 31, 1971.

<sup>11</sup> Environmental Protection Agency. 1971.

<sup>12</sup> 64 FR 3969-3972.

<sup>13</sup> U.S. Department of the Interior. National Park Service. Management Policies. 1988.

<sup>14</sup> Mestre Greve Associates, Inc.. "Noise Assessment for Beaver Basin Road, Pictured Rocks National Lakeshore." Prepared for the National Park Service. 1992

<sup>15</sup> Mestre Greve Associates, Inc. 1992.

use.

### **Snowmobiles and Wolverine:**

One wilderness characteristic the Park should protect is having “all the pieces” of the ecosystem functioning to the greatest extent possible. This would include the pine martin and wolverine. The Crater Lake National Park is a potential den site for these species, as well as a corridor and home range for known denning habitat of these species to the south and north of the Park. The most critical time for wolverines is between January and March when females are establishing dens and giving birth. This exactly coincides with the highest snowmobile use near their habitat between Mt. Thielsen and the north entrance to the Park. The EIS should have disclosed and analyzed the impacts of continued and even increased snowmobile use. The average home range for the wolverine is 98,800 acres. Clearly, wolverines will be impacted by the Park’s snowmobiles. The FEIS must consider if the snowmobiles are inhibiting the wolverine’s recovery to a more abundant and viable population.

The wolverine in particular is very sensitive to human disturbance during nesting season. Snowmobile noise will prohibit wolverines and pine martins from using this important wilderness corridor during the winter months. This diminishes the wilderness characteristics during all times of the year.

### **Snowmobiles and Lynx**

Lynx are known to have populated this area before the county bounty program diminished their numbers decades ago. A search of Oregon county bounty records that was done by the USFWS turned up 19 lynx records from 1909-1919 in Douglas County. There are an additional 9 records from Jackson County (1953-1958). Lynx had a strong historical presence in the Park but were likely extirpated by predator control efforts. These predator control efforts would be considered shocking today -- decades of dropping large amounts of poisoned red meat along the Cascade crest. Since this practice has stopped, hopefully the lynx are now in a state of recovery. The lynx habitat is clearly here and its habitat must be protected in the Park. The General Management Plan EIS must consider how the noise of snowmobiles will affect Lynx recovery.

### **Other impacts:**

Indirect impacts are numerous and exert a considerable impact on wildlife, including birds, large and small mammals, and imperiled species. Groomed trails, like that proposed under alternative 3, alter the critical energy use patterns of animals in the winter, which can disrupt population dynamics, movement and distribution patterns, habitat use, and survival. Trails and roads allow species greater winter maneuverability.<sup>16</sup> Wildlife utilizing groomed roads to save energy and hunt are at a tremendous advantage over those that do not, which disrupts predator-prey relationships.

Snowmobiles dump almost a third of their fuel, unburned, into the snow pack, to be released during spring thaw. The DEIS states that “impacts from snowpack runoff that is contaminated with snowmobile pollutants have not been found.”<sup>17</sup> Could you please clarify, have pollutants not been found because you have not monitored for this, or, have you actually tested for pollutants and they are not there? If it is the case you have not looked, you should make this very clear, and explain when you will start to look.

### **Illegal snowmobile use**

You should also consider the impact of snowmobile **off-trail violations** in the FEIS. The Park should

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<sup>16</sup> Caslick, J.W. "Impacts of Winter Recreation on Wildlife in Yellowstone National Park: A Literature Review and Recommendations." Yellowstone National Park Branches of Planning and Compliance, Natural Resources, and Resources Management and Visitor Protection. 1997.

<sup>17</sup> DEIS page 133.

document how many times snowmobiles have been caught riding over the Pumice Desert, instead of staying on the designated route. Excursions over the Pumice Desert increase the area where noise affects wildlife, and it could also increase negative impacts to the soils of the Pumice Desert itself. The FEIS must consider these impacts when considering weather or not to allow continued use of snowmobiles. For instance, when snowmobiles illegally trespass on the Pumice Desert, there could be serious adverse impacts on small mammals that live beneath the snow. Their habitat is compacted when one or more snowmobiles creates a packed trail. Compaction reduces the temperature of the interface between the snow and the soil and increases thermal conductivity.<sup>18</sup> These temperature changes may significantly decrease the winter survival of small mammals, which may result in broader ecological impacts, including disruption of predator/prey interactions. The compaction might also cause suffocation and death of small mammal as well as habitat fragmentation.<sup>19</sup>

### ***Snowmobiles already have enough***

Near the Parks north boundary is the Oregon Cascade Recreation Area (OCRA). This area was specifically not put in the Mt. Thielsen wilderness by the 1984 Wilderness Act as a concession to snowmobiles.<sup>20</sup> In this pristine roadless area the snowmobiles are allowed to ride on 26,100 acres of the OCRA in the Umpqua National Forest<sup>21</sup>. The Forest Service charges hikers fee-demo prices to hike in the OCRA, but charges snowmobiles nothing to access the OCRA.

Nearby, the pristine 18,620 acre RARE II roadless area of Mt. Bailey is also open to, and well used by snowmobiles. Mt. Bailey is the highest point in Oregon one can legally ride a snowmobile.<sup>22</sup>

In addition to Mt. Bailey and the OCRA, 44,720 acres of snowmobile playgrounds right on the doorstep of Crater Lake National Park, there are 175 miles of groomed trails on the Diamond Lake District, and countless miles of ungroomed logging roads on the district. This is enough. The 9 miles allowed in alternative 2 of the Park's proposed GMP is a tiny percentage of acres open to snowmobiles in the area, yet it is a huge area of impact. The Park's GMP EIS should weigh the trade offs of allowing snowmobiles in 9 miles of the park. We believe this analysis would show the snowmobile use in the park has an unproportional level of negative impacts on hundreds acres of wilderness and numerous wildlife species.

### **Other legal mandates**

The Forest Service provides ample snowmobile opportunities all around Crater Lake National Park, not just in the Umpqua National Forest. The Forest Service's mission covers broad multiple use of the public lands under their management. On the other hand, the Park Service has no such multiple use mandates. "The Park Service is to preserve and protect the natural environment and the fish and wildlife within the park. The Park Service is also committed to preserving the beauty of the park..."<sup>23</sup>

<sup>18</sup> Wanek, W. J. and L.H. Schumacher. "A Continuing Study of the Ecological Impact of Snowmobiling in Northern Minnesota (Final Research Report for 1971-1972)." The Center for Environmental Studies. Bemidji State College, Bemidji, MN. 1974. Schmid, W.D. "Snowmobile Activity, Subnivean Microclimate and Winter Mortality of Small Mammals." *Abstr. of Amer. Inst. of Biol. Scient. Bull. of the Ecological Society of America*. 53(20):37. 1972. Wanek, W.J. "Observations On Snowmobile Impact." *The Minnesota Volunteer*. 34(109):1-9. 1971a.

<sup>19</sup> Randolph, J.C. "Ecological Energetics of a Homeothermic Predator." Ph.D. Thesis. Carleton University, Ottawa, Ontario. 1971. Pruitt, W.O. Jr. *Paper presented at conference on snowmobiles and all-terrain vehicles at the University of Western Ontario*. October 1971.

<sup>20</sup> Umpqua LRMP. Appendix E-2. "The purpose of the ... designation is to provide management options which are not permitted or feasible under the Wilderness Act." "The area shall be managed in accordance with plans prepared to...Provide for use of motorized recreation vehicles." E-3: "...the excellent potential and future demand for motorized recreation ... should be accommodated .... for snowmobiling use" Quotes are from the Oregon Wilderness Act of 1984 and Subcommittee Report.

<sup>21</sup> Additional acres for snowmobiles in the OCRA are available in the Willamette and Deschutes N.F.

<sup>22</sup> Umpqua NF LRMP. Appendix C-128.

<sup>23</sup> Crater Lake enabling legislation (16 USC 121).

If the FEIS ROD continues to allow motorized recreation whose noise and smell disturbs wildlife, the Park Service is not in compliance with their legal mandates<sup>24</sup>.

The Mission of Crater Lake National Park is “To forever preserve the beauty of Crater Lake National Park, its unique ecological and cultural heritage; and to foster understanding and appreciation through enjoyment, education and inspiration.” Allowing snowmobiles in the Park does not “foster understanding and appreciation” of Crater Lake’s “unique ecological and cultural heritage”. Snowmobiles only degrade it with noise and pollution.

The GMP DEIS concludes that snowmobile use will have no impact on park resources and elimination of snowmobiles would result in only “minor benefits to wildlife”. But there was absolutely no data in the DEIS to back this up. The Park has never done a NEPA analysis on current snowmobile impacts on wilderness values, wildlife, or air and water quality. In fact, the DEIS says: “The effects of winter recreational activities in the park are unknown...”<sup>25</sup> And effects to “lynx, wolverine, fisher... is unknown.”<sup>26</sup> It is impossible to conclude that there are no significant impacts when you don’t know the current effects, and therefore have done no analysis of current effects. In fact, we could not find in the DEIS how many miles of snowmobile grooming would be done under alternative 3, or how many miles of snowmobile use would be permitted under all alternatives except 4. This should be made clearer in the FEIS. There is plenty of data on effects of Snowmobiles, of which we have included only a small amount in these comments. The EIS is the place where these effects should be documented. The DEIS failed to include this important information. Please do the analysis in the FEIS. Include the effects to the connectivity the Park offers to the wildlife using the Cascade crest. You don’t have to say the effects are “unknown”. There is data you can, and should use.

### **Snowmobile use will continue to increase**

In 1997 3,500 snowmobile visitors entered the park from November to April.”<sup>27</sup> That number could have doubled in the last seven years<sup>28</sup>. That means that well over 1,000 snowmobiles drive through the wilderness every month during the winter, assuring virtually NO peace and quiet in the wilderness during the winter months (except at night). The DEIS claims that “snowmobile use is not expected to appreciably increase...”<sup>29</sup> The FEIS must either back up this claim, or replace it with an effect analysis on increased snowmobile use. Snowmobile use is increasing everywhere else. Why not in the Park?

Snowmobiles in Crater Lake National Park originate in the Diamond Lake Ranger District of the Umpqua National Forest. In just one year, snowmobile use increased 30% on the Diamond Lake ranger district.<sup>30</sup> The Umpqua National Forest says that “Snowmobiling is an expanding winter sport with the Diamond Lake Recreation Area recognized as among the top 15 destinations in the western US for this activity.”<sup>31</sup> With all this snowmobile activity expanding right on the staging area for Crater Lake National Park, clearly the Park snowmobile use is expanding also.

The DEIS says “Although snowmobile use is not expected to appreciably increase, the Park Service

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<sup>24</sup> Park Mission Goal I: The beauty of Crater Lake National Park and its full array of natural and cultural resources, heritage, processes, values, and wilderness character shall remain unimpaired for future generations.

<sup>25</sup> DEIS page 129.

<sup>26</sup> DEIS page 131.

<sup>27</sup> DEIS page 99.

<sup>28</sup> Snowmobiles Fact Sheet. Bluewater Network [www.bluewaternetwork.org/snowfacts.shtml](http://www.bluewaternetwork.org/snowfacts.shtml)

<sup>29</sup> Approximately 2.5 million snowmobiles are in use today. Sales have doubled in the last 5 years.” 1999-2000.

<sup>30</sup> DEIS page 99.

<sup>31</sup> Windigo Snowmobile Winter Shelter EA. Umpqua NF. August 2001. Response to public comments. John Ouimet District Ranger. 6/12/02. page 2. There were an average of 99 snow machines per day in 00-01, increasing to an average of 139 snow machines per day in 01-02.

<sup>31</sup> Windigo Shelter EA. Umpqua NF. August 2001. Appendix B, ID Team Scoping. May 3, 1999. I.D. Team #1. page 1.

would initiate a long-term data gathering and monitoring program to evaluate use and associated impacts as part of an overall winter recreational use study.”<sup>32</sup> This is no comfort. The Park doesn’t have the money to do monitoring in a timely way, with no guarantees of congressional appropriations in the near future. Additionally, this monitoring reference was only associated with water and air quality monitoring. Snowmobile noise pollution was not included.

Crater Lake National Park has never put a speed limit on snowmobiles or required a muffler providing for wildlife friendly noise reduction. The Park could have mitigated some snowmobile impacts in the northern portion of the Park, but instead the EIS failed to address most impacts from snowmobiles.

## **2. Snowcoaches**

The DEIS failed to define snowcoaches. The FEIS should correct this problem. What are they, what can they do or not do, and most importantly, what are their impacts? Are they as noisy and polluting as snowmobiles? Are they comparable to a SUV? How many people do they hold?

In general, we support more mass transportation and less personal transportation in the park. Therefore, we like the snowcoach idea from Mazama Village to the Rim Village in the winter, instead of plowing the road. We assume the snowcoaches will be better on the environment than plowing the road and allowing private vehicles to drive up. But we would rather the FEIS analyze and describe the impacts.

That analysis might find that a “snow coach” ride would entice more visitation to the park in the winter. It sounds like fun – more fun than worrying if your 2-wheel drive car can make it up there safely.

## **3. Rim Drive**

The Park should initiate a shuttle service around the Rim Drive, now, before there is more traffic. The preferred alternative currently provides for shuttles ONLY “if, in the future, crowding conditions developed.”<sup>33</sup> However, the Rim Drive is currently over crowded, especially during summer weekends. The shuttle should be initiated now, during those times. Drivers of large RVs would likely prefer to take a shuttle service. This would immediately, and drastically reduce traffic on the Rim Drive. After all, most respondents to your scoping request “favored use of shuttles”<sup>34</sup>.

We support closing off part of the Rim Drive during part of the year to facilitate a more enjoyable hiking or biking experience around the Rim Drive. There could also be times where motorcycles are the only motorized vehicles allowed.

At the least, the road section between Cleetwood Cove over and Kerr Notch should become one-way for private vehicles, like it was in the past. This makes a much more enjoyable drive around the Rim. We don’t understand why the one-way proposal was only in Alternative 3. It should have been considered in actions common to all alternatives.

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<sup>32</sup> DEIS page 133.

<sup>33</sup> DEIS. Page 44.

<sup>34</sup> DEIS. Page 8.



#### **4. Grayback Road**

We support changing this road to non-motorized recreation use, or decommissioning it entirely. One concern about non-motorized use is equestrian impacts. Horses can have a heavy impact on a trail, especially in wet weather. Heavy equestrian use could contribute to erosion, rutting and compaction problems that, over time, equal those of ATVs. Horses also will introduce non-native species deep within the wilderness area that the Grayback road goes through. Weeds can either be carried in with their feed, or can be deposited in their manure.

The FEIS should address this problem and offer mitigations. We realize that equestrian use is already allowed in wilderness areas elsewhere in the park. However, this is the first time this impact will be introduced to the southeast half of the park.

Another problem with equestrian use is the impact to other users. Rutted and potmarked trails are difficult to walk on. Manure (and associated flies) is unpleasant to walk on and can build up in some of the best resting/camping areas, possibly making the best places unusable by people.

Has the Park ever monitored the impact of equestrian use on the Pacific Crest Trail that goes through the park? This type of recreation should not be expanded in the park unless this monitoring has been done and impacts considered.

#### **5. Resource Protection**

Only in Alternative 4, would the park “be an active partner in a regional conservation strategy that would include other agencies and environmental groups.”<sup>35</sup> Why isn’t this included in actions common to all alternatives?

Other areas of Alternative 4 that should be included in all alternatives include re-routing existing trails away from sensitive areas, reviewing the trail system, and providing new trails. Also, why is this only in alternative 4: “Interpretive programs would focus on stewardship within the park and on the protection of resources, while incorporating this philosophy into everyday life.”<sup>36</sup>

In “Actions Common to All Alternatives”, the DEIS defines “small facilities, including antennas”<sup>37</sup> appropriate for the backcountry managed as wilderness. We disagree that antennas, especially cell phone antennas, are appropriate in an area managed for wilderness characteristics. Antennas should not even be put in front country areas where they can be seen in the backcountry.

The GMP DEIS never considered the environmental impacts of managing a park whose acres are too small for adequate resource protection. There have been several proposals to increase the size of Crater Lake National Park. The DEIS should have considered the merits of these proposals. The DEIS says: “The combination of widespread logging and suppression of natural fires has affected the natural forest stands throughout portions of the park and surrounding areas. Such changes may also have altered wildlife distribution, frequency, and use of habitat from that which existed prior to the Park’s establishment.”<sup>38</sup> But the DEIS never tells the public if these changes have been positive or negative or the cumulative effects to park resources. The FEIS should be clearer by including a discussion of the

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<sup>35</sup> DEIS page 57.

<sup>36</sup> DEIS page 57.

<sup>37</sup> DEIS page 35.

<sup>38</sup> DEIS pages 121, 122.

problem of the small size of Crater Lake, the effects on natural resources due to the small size, and how this could be improved by expanding the Park boundaries. During scoping, the Park was given a proposal to include the Diamond Lake/ Mt. Bailey area (on the Park's north boundary) into a national monument (the Medicine Mountain National Monument) to complement the resource protection goals of Crater Lake National Park. This is the type of expansion the GMP should weigh in on. At the least, the EIS should document a wish-list of how natural resources could be better protected in the future. (Similar to the expansion needs expressed in the Oregon Caves National Monument GMP).

The DEIS says: "Beneficial effects to late-successional forest species are expected from implementation of the President's NW Forest Plan (NFP). The plan includes development of a network of forest reserves across the Pacific Northwest to protect late-succession forest species..."<sup>39</sup> What the DEIS failed to disclose is what NFP land allocations border the park. True, the NFP includes some reserves, like Late Successional Reserves (LSRs) to protect late-successional forest species. But if LSRs don't border the park, the park doesn't get much benefit from them. If the Matrix land allocation borders the park, the park boundaries are scheduled for clearcutting within the next couple of decades. This would have a terrible effect on Park resources. The FEIS should clarify that, even though the Forest Service is managing land bordering the park under the NFP, this could or could not benefit the park, depending on what land allocation borders the park.

## 6. Monitoring

The DEIS failed to include a viable monitoring plan, as required by NEPA<sup>40</sup>. Several times the DEIS mentions that monitoring will happen, but no monitoring details were given, such as: what would be monitored, how often, and what benchmarks would need to be reached for adaptive management to kick in.

For instance, snowmobiles are being allowed to continue, because, in part, "The Park Service would initiate a long-term data gathering and monitoring program to evaluate winter use and associated impacts to ensure long-term protection of park resources."<sup>41</sup> When do you plan to begin this? What will you look for? How will this be paid for? Are monitoring funds guaranteed? If not, what priority will monitoring have in available funding? Who will do the work? What authority do you have to discontinue snowmobile use if pollutants are found?

## 7. Research

Our organization is in favor of increased research into the forested and desert ecosystems surrounding Crater Lake. However we have a concern that was not addressed in the DEIS. The DEIS says, "Research natural zone ... includes the remaining lands contained in the 1974 wilderness recommendation not zoned as backcountry."<sup>42</sup> How many acres is this? Would it remove these areas from future wilderness consideration?

Only in Alternative 4 would "research within the park be nonmanipulative."<sup>43</sup> We assume this mean that in other alternatives, the research would be manipulative. If research is non manipulative only in

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<sup>39</sup> DEIS page 122.

<sup>40</sup> 40 CFRs 1505.2, 1505.3

<sup>41</sup> DEIS 133.

<sup>42</sup> DEIS page 45.

<sup>43</sup> DEIS page 57.

alternative 4, how manipulative will the research be in other alternatives? This raises a concern that research in wilderness areas could negatively influence wilderness characteristics. If research will be manipulative for alternative 2 and 3, the DEIS should have described it better.

## **8. Recognition**

The Vicinity Map on page 5 of the DEIS neglected to show Roseburg, even on the state map insert. This gives the impression that Crater Lake National Park is not an important component of Roseburg, even though Roseburg is considered a “gateway” community<sup>44</sup>. Please put us on the map in the FEIS.

On page 198 of the DEIS you list Organizations that were sent the DEIS. Umpqua Watersheds, Inc. submitted at least 2 detailed scoping comments, and was sent the DEIS. You forgot to include that name in the DEIS. Please include it in the FEIS.

**In conclusion**, we would like to thank the National Park service for protecting the natural resources in Crater Lake National Park and enhancing visitor enjoyment of the park. Please consider these comments in the FEIS. The final EIS would also be easier to follow if you included a table comparing the effects in the Environment Consequences section, especially comparing the costs of the different alternatives.

Sincerely

Francis Eatherington  
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George Sexton  
Klamath Siskiyou Wildlands Center  
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Oregon Chapter Sierra Club  
2950 SE Stark St., Suit 110  
Portland, OR 97214.

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<sup>44</sup> DEIS page 19.

From: Nancy Stern

129 Swanie Lane

Glide, OR 97443

September 25, 2004

Dear National Park Service:

My husband and I recently returned from our annual fall pilgrimage to Crater Lake. Since we live nearby, we are fortunate in being able to visit the Park several times each year; it has become a treasured part of our interior lives, providing unsurpassed serenity and spiritual refreshment. Besides the awe-inspiring beauty of the Lake itself, the subtle features impressed us during this most recent visit: the scent of the pines and firs, the music of the wind through the trees, the birdcalls and squirrel-scamperings; the muted rumble of a rockslide somewhere on the rim.

We were delighted to learn that the plans for renovating the Rim Village include moving the parking lot back behind the buildings and converting what is now the parking lot into a pedestrian area planted with native species. That will be a terrific improvement; we noted how annoying it was when certain visitors let their diesel engines run at idle for protracted periods of time and, even in our car-obsessed culture, few of us think that the sight of vehicles enhances the Crater Lake vista.

In the winter, we cross-country ski on the North Entrance Road. The presence of snowmobiles is a jarring, ugly intrusion into that peaceful, wild world. There is absolutely no reason to continue to allow snowmobiles in Crater Lake National Park. There are many, many miles of snowmobile trails very nearby in the Diamond Lake and Mt. Bailey areas. Our National Forests are, for good or ill, designed for “multiple use”; our National Parks have a different mission: “[The National park Service preserves unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations.](#)” I believe the noise, pollution, and intrusiveness of snowmobiles at Crater Lake impair the beauty and integrity of the Park. Surely, these machines disturb the sensitive animal species that have found refuge in the Park—the pine marten and the wolverine, driven out of their historic ranges by human impacts, may be making their “last stand” at Crater Lake.

While I would like to see more research done (as in Alternative 2), I do not support expanded recreational activities if these activities detract in any way from the tranquility, pristine purity, and timeless natural beauty of Crater Lake. If visitors want more “action” than gazing at the incredible grandeur of the Lake and filling their senses with the sounds, fragrances, and sights of this unique place, let them go elsewhere—into our numerous recreation areas and National Forests. **I strongly encourage you to select Alternative 4.** Snowmobiling is not an appropriate recreational activity at Crater Lake.

I also urge the Park Service to avoid expanding the Rim Drive to accommodate large RV's. Funds would be better spent maintaining the existing Drive, restoring some of the beautiful, traditional rock walls (part of our cultural heritage), and providing some sort of mass transit for those who lumber up to the Lake in their huge vehicles. Would quiet, nonpolluting electric cars be possible? I am not sure what the policy on gasoline-driven boats is; these should be banned if they are now allowed. Closing the east part of the Drive for part of the year or

restoring one-way traffic is fine with me if it would reduce human-caused degradation of the resource.

As you can see, my number-one priority is preserving the natural resources of Crater Lake or restoring them where damaged. **I urge the Park Service to choose Alternative 4 and provide a staunch defense for the perpetuity of our uncorrupted, priceless gem, Crater Lake.**

I would appreciate a return receipt.

Sincerely,

Nancy Stern

September 30, 2004

Teri Urbanowski, DSC- p  
National Park Service  
PO Box 25287  
Denver, CO 80225- 0287

Re: Draft General Management Plan/EIS Statement, May '04

I have read the draft Crater Lake National Park Management Plan and offer the following thoughts. I am a long time user and advocate for snowmobilers and past officer and president of the Oregon State Snowmobile Association.

The relationship between the CLNP and the snowmobilers has been a positive one. We have been concerned, however, that the furor over Yellowstone NP not carry over to CLNP. At first glance, Alternative #2 appeared to be an excellent option. After looking at it more closely however, I must endorse Alternative #3.

Alternative #2 causes some concern it that it reduces motorized traffic in favor of walking and bicycling, thereby excluding many elderly and handicapped users. It limits snowmobile access to current number, yet adds a snow coach. There is no justification for reducing snowmobile access to current numbers. If there is some perceived air or water pollution, and there is no evidence to support this, then considering a snow coach makes no sense.

Snowmobilers would like to be able to go in one entrance and out another and take advantage of Park Services. As regards the statement that snowmobilers have a network of roads and trails available outside the park, is this not true for other users? This has nothing to do with the park.

Alternative #3 is the more visitor friendly alternative. Many snowmobilers are senior citizens who want to have the opportunity to enjoy the park in winter. I endorse Alternative 3# for all the above reasons.

Howard Gieger  
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September 29, 2004

Teri Urbanowski, DSC- P  
National Park Service  
P. O. Box 25287  
Denver, CO 80225\_0287

RE: Crater Lake National Park Draft General Management Plan/EIS, May, 2004

Dear Sir or Madam:

I am writing to comment of the discussion of alternatives presented in the above referenced draft. I am writing as a snowmobiler who appreciates the park in the winter and who has chosen a snowmobile as my means of transportation. I try to fit in a winter visit to the Park each season and I especially appreciate the opportunity to share this spectacular experience with new and out of state visitors.

I would first like to mention the "Alternatives or Actions Considered But Eliminated From Further Study" on page # 67. The section states that "Some comments received during public scoping suggested that the Park Service should consider increasing the number of roads in the park that are open to snowmobile use. Currently, snowmobiles are allowed along the North Entrance Road to North Junction to accommodate winter lake viewing access." The section goes on to justify eliminating further study because others use the roads and wouldn't like to encounter snowmobiles for various reasons. The section concludes snowmobiles don't need more or different access because snowmobilers have a "substantial network of roads and trails available for recreational use outside the park."

I strongly object to the bias and short sightedness reflected in the above conclusion. Enjoyment of the network of roads and trails on the National Forest outside the Park has no bearing on the desire or need that a snowmobiler has to use his or her form of transportation

To presume visitor expectations that the experience will be different in the winter than the summer, where paved roads are to be managed as front country, is a stretch. This means at times there will be a multitude of visitors using varying forms of transportation in the summer: why not in the winter? The snowmobile community has not requested they be allowed to ride off road or off trail in the Park. Their primary reason for visiting the Park is to view the lake and surrounding area. They simply would like to be able to enter the Park from one entrance, depart from another and perhaps access some services along the way.

Now to the alternatives presented. Alternative #2 is listed as the preferred alternative and is described as having an emphasis on Increased Visitor Opportunities. At first reading I was ready to support this alternative as it included continued snowmobile access and provided a good balance of scientific and research pursuits, educational activities and visitor access. As

time allowed and I studied the document further I find I must change my mind and side with Alternative #3.

Alternative #2 would close the Grayback Road and provides for seasonal closure (summer) of part of rim drive...this despite the statement on page 97 that “Auto touring remains the predominant visitor activity.” It appears there is an attempt to move this predominant activity from auto touring to bicycling and hiking. These later forms of visiting the Park are clearly for the young and the physically healthy. As the baby boom generation ages and retires with the resources and time to visit our National Parks, Alternative #2 would serve to limit and restrict their ability to appreciate these special places.

My second reading of the document also revealed in Alternative #2, hidden away under Air Quality on pages 152 and 153, a sentence that would restrict snowmobile use to existing use levels because snowmobiles raise concerns about long term impacts from high pollution emissions. This presumption cites no research to support the concern. Where did the concern come from? Please refer to a study conducted by Robert Musselman from the Forest Service Rocky Mountain Research Station in Ft. Collins, Colorado. His study of air quality (monitoring station) and snow chemistry (core samples along trail corridor) related to snowmobiling at and near the Green Rock Parking Area in the Snowy Range of the Medicine Bow- Routt National Forest seems a good analysis and his preliminary finding is that there are not really any affects from snowmobile use confirmed.

Another consideration regarding the “concern” about high pollution emissions should be given to the recent regulation process by the EPA for snowmobiles. While this regulation process is relatively recent, it is already producing profound changes in both 2- stroke and 4- stroke engine technology for snowmobiles. The EPA regulations are producing 30% reductions in snowmobile emissions almost overnight with targets over the next few years that will produce models of snowmobiles with 50 to 90% reductions in emissions. **The “concern” about long term impacts from high pollution emissions is not well founded and should not be used as a reason to limit snowmobile access to current levels.**

Though not stated outright as a reason to limit snowmobile access, the document contains statements in Alternative #1, page 133, and Alternative #3, pages 168 and 169 that snowmobiles raise concerns “about long term impacts from high pollution emissions. Emissions from 2- stroke engine exhaust include monoxide hydrocarbons, nitrous oxides and particulate matter. These concerns include the possibility that accumulations of pollutants in the snow pack and resultant snow pack run off may be having adverse impacts on water quality and associated aquatic systems although impacts from snow pack run off that is contaminated with snowmobile pollutants have not been found.” Again, where do the concerns come from? This reads like a classic in circular thinking. Again, please refer to Robert Musselman’s work. Please also read a U. S. Geological Survey Water- Resources Investigations Report 99- 4148 “Effects of Snowmobile Use on Snowpack Chemistry in Yellowstone National Park, 1998” by George Ingersoll that was released in 1999. Keep in mind, this research was conducted in Yellowstone National Park where there is exponentially greater snowmobile use than would ever be found in Crater Lake National Park. Some highlights of the Ingersoll report include:



- Hydrocarbon levels in the snowpacks near snowmobile use were elevated relative to background snowpack chemistry in the study but were lower, in general, than concentrations at hundreds of locations nationwide representing a full spectrum of watershed settings ranging from sub alpine to urban.
- Drinking- water standards for benzene, toluene and xylenes published by EPA far exceed any levels detected in either snow or snow melt runoff at Yellowstone in this study.
- Even the highest detections of benzene or toluene in snow (at an in- road groomed road/trail site) or in snowmelt at Yellowstone are far less than the established standards for water consumed by humans (less than 4 percent and less than 1 percent respectively.)
- Results indicate that snowmobile use along the routes (groomed roadways) may not be substantially affecting atmospheric deposition of ammonium, sulfate, and hydrocarbons related to gasoline combustion.
- Analysis of snowmelt- runoff chemistry indicate that elevated emission levels in snow along highway corridors (groomed roadways) generally are dispersed into surrounding watersheds at concentrations below levels likely to threaten human or ecosystem health.

If there are no adverse impacts to the snowpack in Yellowstone National Park, then I believe it is safe to say there will absolutely be no affects to the snowpack in Crater Lake National Park where the annual snowmobile visit estimate is less than some daily visit numbers in Yellowstone. Alternative #3 on page 168 acknowledges snowmobile volume is not expected to increase appreciably.

On page 91 under Affected Environment, Natural Resources, there is a lengthy discussion about the 34,000 acres of “potential” Canada Lynx habitat with the implication that the decision may be influenced by the alternative’s affect on this potential habitat. The Park’s own studies have failed to produce any evidence of resident Lynx. The only evidence of historical Lynx presence is a pelt in a museum from 1898 alleged to have been trapped in an area south of the Park.

I would urge that Park officials study recent literature that describe the lynx as being generally tolerant of humans and “to date, most investigations of lynx have not shown human presence to influence how lynx use the landscape.” (Aubrey, 2000 and Staples, 1995), Further, I believe there is a recent 9<sup>th</sup> Circuit ruling that concludes designated habitat must have been or be inhabited by the species it is being designated for.

As stated before, I wanted to be able to endorse the preferred alternative as written, but further study makes that alternative not palatable. Assuming the no action alternative,

Alternative #1, will not be selected, given my growing concern with Alternative #2 and the fact that Alternative #4 would preserve the Park **from** the public, I find I must endorse Alternative #3.unless the decision makers are willing to consider substantial changes in Alternative #2.

CONSULTATION AND COORDINATION

Finally, I am concerned about the cost. For the last few years Crater Lake Park has had to cut services because of funding shortages. A Eugene Register Guard Newspaper article dated August 7, 2004, speaks to making the plan flexible enough to deal with the whims of Congress and funding. Any plan that proposes additional expenditures is doomed to fail unless additional funding is secured either from Congress or from private sources.

Thank you for the opportunity to comment on the Draft General Management Plan and I request you keep me informed as the decision process moves on.

Sincerely,

Joni Mogstad  
Oregon State Snowmobile Association  
4797 Old Dillard Road  
Eugene, Oregon 974075

[Jonimogs@aol.com](mailto:Jonimogs@aol.com)

CC: Charles V. Lundy, Superintendent  
Crater Lake National Park  
P. O. Box 7  
Crater Lake, Oregon 97604

John Bastion, O.S.S.A. President  
Representative Greg Walden  
Senator Gordon Smith

Teri Urbanowski, DSC\_P  
National Park Service  
P. O. Box 25287  
Denver, Colorado 80225-0287

August 13, 2004

RE: Draft General Management Plan/Environmental Impact Statement  
Crater Lake National Park

Dear Sir or Madam:

I am writing as a snowmobiler and a fan of Crater Lake National Park to tell you that I am in support of your preferred alternative (Alternative 2) with a couple of reservations. I appreciate the fact that the preferred alternative retains snowmobile access to the park in winter by way of the North Entrance. I have visited the park numerous times by this method and appreciate the opportunity to guide out of state visitors to the North rim in the winter so they too can appreciate the spectacular vista.

I am disappointed you did not see fit to provide for a loop route so that snowmobilers could ride into the park from one entrance and leave via another. I am also disappointed in the comment made in the analysis that snowmobiles have access to many miles of trails on the National Forest outside the park (implying that the access to miles outside the park diminish the need for miles inside the park). I chose a snowmobile as my form of transportation. I don't ride into the park simply for the sake of riding. I ride into the park so I can enjoy the lake, the blue of the water against the white of the snow and the blue of the sky and the white of the clouds. Other outstanding vistas include the windswept trees on the rim with the ice clinging to them in vertical icicles. You don't see these things outside the park where there are many miles of trails available.

I am reluctant to support the idea of snow coaches entering the Park from the north entrance. The reason for my reluctance is this. The person whose analysis is cited above regarding the reference to many miles outside the park and who doesn't understand the snowmobile experience may well take a leap to the conclusion that snow coaches can replace snowmobiles. I certainly don't want that to happen!

I fail to see the advantage to seasonal closure of the East rim. As the baby boom generation ages, they will depend more and more on assisted transportation. Closing this rim road even seasonally will limit the scope of their ability to enjoy the lake.

Finally, I am concerned about the cost. For the last few years Crater Lake Park has had to cut services because of funding shortages. A plan that proposes additional expenditures is doomed to fail unless additional funding is secured.

I am writing to support the preferred alternative (Alternative #2) with the above reservations.

Sincerely,

*Kenneth E. Anderson*  
*Rochelle C. Anderson*

cc: Charles V. Lundy, Superintendent  
Crater Lake National Park  
P. O. Box 7  
Crater Lake, Oregon 97604

**Received DSC-P**

**SEP 30 2004**

September 27, 2004

Teri Urbanowski, DSC-P  
National Park Service  
P. O. Box 25287  
Denver, CO 80225-0287

RE: Draft General Management Plan/Environmental Impact Statement, May '04

Dear Sir or Madam:

After a brief review of the Draft General Management Plan/Environmental Impact Statement dated, 2004 that suggests alternatives for the future management of Crater Lake National Park, I sent a letter endorsing the Preferred alternative, alternative #2 with reservations because it (alternative #2) appeared to be a balanced approach to managing the park that was fair to most users and encouraged research and scientific and educational pursuits.

As time later allowed for a more detailed examination, I found hidden away under "Air Quality" in Alternative #2 on page 153 a one-sentence statement that would restrict snowmobile access to current levels. The remainder of the paragraph talks about concerns related to emissions and concerns about long term impacts. There follows a statement that the Park will initiate a monitoring program to determine whether these concerns are valid. To limit this form of access based on unfounded concerns is unacceptable, especially in light of the well published and publicized advances in technology that have so far met and exceeded Environmental Protection agency air quality standards. If there is an air quality concern, it should be focused on snow coaches and plows which often are fueled by diesel and which are no more efficient than the new generation of snowmobiles.

If the sentence to restrict snowmobile access to current levels is left in Alternative #2, I must change my support to Alternative #3, which is much more visitor friendly than any of the other alternatives.

I would also like the park to reconsider its position on opening more areas to snowmobiles. A trail from the current trail to the lodge and connecting to the 1000 Springs trail system would allow more people to enjoy the park and not have an adverse affect on the overall enjoyment of the park.

Sincerely,



Wendell J. Dick  
6720 Camellia Ct.  
Springfield, OR 97478

Superintendent Charles Lundy

Crater Lake National Park  
P.O. Box 7  
Crater Lake, OR 97604

RE: Comments on Crater Lake's draft General Management Plan

Dear Superintendent Lundy:

Crater Lake National Park is one of the park system's most spectacular places. We owe it to ourselves and future generations of Americans to leave Crater Lake's resources and wildlife unimpaired. I am therefore encouraged to learn that the Park Service's draft general management plan appears to be a step in the right direction.

I support alternative four. Specifically, I support this alternative's ban on snowmobiles, the seasonal closure of parts of the rim drive, the closure and reclamation of the Grayback road, and the use of mass transit shuttle buses and snowcoaches to access key park sites. However, alternative four should be strengthened to include safeguards such as a ban on gasoline powered boats, better monitoring of off-road vehicles as required under Executive Orders 11644 and 11989, and a ban on the privatization of interpretative, resource management and visitor protection services. I also urge the Park Service to adopt cleaner and greener fleets and better define appropriate recreation as called for in Bluewater Network's comments on the draft management plan.

Crater Lake is a supreme jewel of the park system with irreplaceable resources and wildlife. I call upon the Park Service to ensure the full protection of these resources by adopting alternative four in the draft general management plan.

Sincerely,

J. W. & Mary Lee Milton  
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